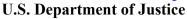
Case 1:16-cr-00776-VEC Document 124 Filed 03/10/17 Page 1 of 1





The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

March 10, 2017

BY ECF

The Honorable Valerie E. Caproni United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: United States v. Joseph Percoco, et al., 16 Cr. 776 (VEC)

Dear Judge Caproni:

We write in response to the Court's order dated January 25, 2017, requiring that the Government update the Court weekly with regard to the status of discovery in the above-captioned matter. As noted in its March 3, 2017 letter, the Government has completed production of discoverable materials obtained by the Government as of the first pretrial conference on December 1, 2016. The Government has made no additional productions since its last update letter. With regard to (i) discovery obtained since December 1, 2016, during the Government's ongoing investigation, and (ii) potentially-privileged materials, the Government remains on track to continue a rolling production of these materials as set forth in prior letters. The Government expects to make its next production available to the defense on March 15, 2017.

Respectfully submitted,

PREET BHARARA

United States Attorney for the Southern District of New York

By: /s Janis Echenberg

Janis Echenberg/Robert Boone/ David Zhou/Matthew Podolsky Assistant United States Attorneys (212) 637-2597/2208/2438/1947

cc: Counsel for all defendants (via ECF)

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¹ The Government previously noted that it anticipated producing, on March 7, 2017, a limited number of iCloud account files, which were inadvertently not processed with the initial productions. Because processing by our discovery vendor was unexpectedly delayed, the Government expects to make these materials available to the defense on March 15, 2017.